DRAFT/PROPOSED CAAPP PERMIT
November 6, 2014

Attention:

Signode - Bridgeview
Attn: Mark Hollo
7701 West 71st Street
Bridgeview, Illinois 60455

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Signode - Bridgeview
7701 West 71st Street
Bridgeview, Illinois 60455

I.D. No.: 031027AAG
Permit No.: 95090018

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application:	Renewal
Purpose of Application:	Renew Existing CAAPP Permit for 5 Years
ID No.:	031027AAG
Permit No.:	95090018
Statement of Basis No.:	95090018-1411
Date Application Received:	April 4, 2010
Date Issued:	TBD
Expiration Date:	TBD
Renewal Submittal Date:	9 Months Prior to TBD
Source Name:	Signode - Bridgeview
Address:	7701 West 71st Street
City:	Bridgeview
County:	Cook
ZIP Code:	60455

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Justin Cameron at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:JTC:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database

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Section 1 – Source Information

1. Addresses

Source

Signode – Bridgeview
7701 West 71st Street
Bridgeview, Illinois 60455

Owner

Signode Industrial Group LLC
3650 West Lake Avenue
Glenview, Illinois 60026

Operator

Signode – Bridgeview
7701 West 71st Street
Bridgeview, Illinois 60455

Permittee

The Operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	Name	*Title*
Responsible Official	Ronald D. Kropp	SVP & CFO
Delegated Authority	Mark E. Hollo	Senior Plant Engineer

Other Contacts

	Name	*Phone No.*	*Email*
Source Contact	Mark Hollo	708-458-7320 (Ext 230)	mhollo@signodemidwest.com
Technical Contact	Mark Hollo	708-458-7320 (Ext 230)	mhollo@signodemidwest.com
Correspondence	Mark Hollo	708-458-7320 (Ext 230)	mhollo@signodemidwest.com
Billing	Mark Hollo	708-458-7320 (Ext 230)	mhollo@signodemidwest.com

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

I.D. No.	*Permit No.*	*Single Source Name and Address*
N/A	N/A	N/A

Section 2 – General Permit Requirements

1. Prohibitions

a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]

b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]

c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]

d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

a. i. An emergency occurred and the source can identify the cause(s) of the emergency.

ii. The source was at the time being properly operated.

iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.

b. For purposes of Section 39.5(7)(k) of the Act, “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.

c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]

ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]

iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. Sample or monitor any substances or parameters at any location at reasonable times:

A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or

B. As otherwise authorized by the Act.

v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:

A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.

B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.

C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.

D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.

ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]

ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.

ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:

A. The identification of each term or condition of this permit that is the basis of the certification.

B. The compliance status.

C. Whether compliance was continuous or intermittent.

D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to the IEPA Compliance Section. Address is included in Attachment 3.

iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after **Error! Bookmark not defined.**_____ (date USEPA notice started), unless this permit has been modified to reflect such new requirements.

b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an “applicable Clean Air Act requirement” or an “applicable requirement” in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.

b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as “TIR”.

   i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

   ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant’s request.

c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as “TIN”.

   i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

   ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant’s request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;

iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or

iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]

b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 – Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particular matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 658 ATUs per seasonal allotment period.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.

ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.

iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.

iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of $150.

ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).

iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. NESHAP Standards (40 CFR 63 Subpart DDDDD)

Pursuant to 40 CFR 63.7495(b), no later than January 31, 2016, the source must:

i. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.4(c).

ii. Have a one-time energy assessment performed on the source as specified in 40 CFR 63 Subpart DDDDD Table 3 Condition 2, pursuant to 40 CFR 63.7500(a)(1).

f. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:

A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.

B. Estimated frequency of application of dust suppressants by location.

C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.

ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

iii. The Fugitive PM Operating Program, as submitted by the Permittee on October 16, 2014 (last updated in January 2007), is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.

iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM_{10} Contingency Measure Plan

i. Pursuant to 35 IAC 212.700, the Permittee shall have on file with the IEPA a PM_{10} Contingency Measure Plan reflecting the PM_{10} emission reduction set forth in 35 IAC 212.701 and 212.703.

ii. The PM_{10} Contingency Measure Plan shall be implemented by the Permittee in accordance with 35 IAC 212.704 upon notification from the IEPA.

iii. Pursuant to 35 IAC 212.701(c), for operational changes subject to 35 IAC 212.304, 212.305, 212.306, 212.308, 212.316(a) through (e), 212.424 or 212.464 which require either a new permit or a revision to an existing permit, the Permittee shall, within 30 days after such changes, submit a request to modify this CAAPP permit in order to include a new, appropriate PM_{10} Contingency Measure Plan.

iv. The PM_{10} Contingency Measure Plan, as submitted by the Permittee on October 16, 2014 (last updated in January 2007), is incorporated herein by reference. The document constitutes the formal PM_{10} Contingency Measure Plan required by 35 IAC 212.701, addressing the Levels 1 and 2 control measures for reducing annual source-wide fugitive emissions of PM_{10} from plant roads (paved and unpaved) and materials handling operations in the event of an exceedance of the 24-hour ambient air quality standard for PM_{10} under 35 IAC 212.704 or 212.705.

v. The Permittee shall keep a copy of the PM_{10} Contingency Measure Plan. The Permittee shall also keep a record of activities completed according to the PM_{10} Contingency Measure Plan.

vi. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the PM_{10} Contingency Measure Plan, any amendments or revisions to the PM_{10} Contingency

Measure Plan (as required by Condition 3.2(b)), and the Permittee shall also keep a record of activities completed according to the PM_{10} Contingency Measure Plan.

c. Episode Action Plan

Should this source become subject to 35 IAC 244.142, the Permittee shall prepare, submit, and operate under an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures and submitted to the IEPA for its review. The Episode Action Plan shall contain the information specified in 35 IAC 244.144. The Permittee shall immediately implement the appropriate steps described in this Episode Action Plan should an air pollution alert or emergency be declared. Any future Episode Action Plan made by the Permittee during the permit term is automatically incorporated by reference provided the Episode Action Plan is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Episode Action Plan. In the event that the IEPA notifies the Permittee of a deficiency with any Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:

I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), 3.1(d), and 3.1(e).

II. Requirements in Conditions 3.2(a), 3.2(b), and 3.2(c).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

Monitoring Period	Report Due Date
January through June	July 31
July through December	January 31

ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 – Emission Unit Requirements

4.1 Cold Rolling Mill

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Cold Rolling Mill (CRM)	PM and VOM	Prior to April 14, 1972	N/A	Mist Eliminators #1 and #2	None

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. <u>Particulate Matter Requirements (PM)</u>

A. Pursuant to 35 IAC 212.322(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c). (See Section 7.2)

B. Pursuant to 35 IAC 212.324(b), no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period, with the following exception: The mass emission limit in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 IAC 212.324(b).

ii. <u>Compliance Method (PM Requirements)</u>

<u>Monitoring</u>

A. Pursuant to 35 IAC 212.324(f), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. 35 IAC 212.324 shall not affect the applicability of 35 IAC 201.149. Proper maintenance shall include the following minimum requirements:

I. Visual inspections of air pollution control equipment;

II. Maintenance of an adequate inventory of spare parts; and

III. Expeditious repairs, unless the emission unit is shutdown.

B. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the cold rolling mill, its associated auxiliary equipment, and the mist eliminators.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records:

I. A file containing the method used by the Permittee to determine emissions of PM, with supporting documentation.

II. The emissions of PM, ton/mo and ton/yr (12 month rolling average, calculated at least monthly), with supporting calculations, which demonstrate compliance with the applicable requirements (lb/hr) in Condition 4.1.2(b)(i)(A).

III. The hours of operation of the rolling mill, hr/mo and hr/yr.

D. Pursuant to 35 IAC 212.324(g), the Permittee shall maintain the following records of maintenance and repair:

I. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 IAC 212.324(f).

II. The Permittee shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.

III. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.

IV. Copies of all records required by 35 IAC 212.324 shall be submitted to the Agency within ten (10) working days after a written request by the Agency.

V. The records required under 35 IAC 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.

VI. Upon written request by the Agency, a report shall be submitted to the Agency for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record for the inspections required by Condition 4.1.2(b)(ii)(B). These records shall include the following, at a minimum:

I. Date and time inspections were performed,

II. Name(s) of inspection personnel,

III. Identification of equipment being inspected,

IV. Findings of the inspections,

V. Operation and maintenance procedures, and

VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the above limitation shall apply only to photochemically reactive material.

ii. Compliance Method (VOM Requirements)

Recordkeeping

A. Pursuant to Sections 39.5(7) (b) and (e) of the Act, the Permittee shall maintain records to demonstrate that maximum organic material discharge from the cold rolling mill complies with the requirements of Condition 4.1.2(c)(i)(A).

3. Non-Applicability Determinations

a. The Cold Rolling Mill is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for PM emissions because the Cold Rolling Mill does not have potential pre-control device PM emissions that equal or exceed major source threshold levels.

b. The Cold Rolling Mill is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for VOM emissions because the Cold Rolling Mill does not use an add-on control device to achieve compliance with an emission limitation or standard for VOM.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), and 4.1.2(c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.2 Contact & Quench Pots (Magnus Lines)

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Lead Contact Pot with Natural Gas-Fired Heater (M2-1)	PM and SO_2	Prior to April 14, 1972	N/A	None	None
Lead Quench Pot with Natural Gas-Fired Heater (M2-2)	PM and SO_2	Prior to April 14, 1972	N/A	None	None
Lead Contact Pot with Natural Gas-Fired Heater (M3-1)	PM and SO_2	Prior to April 14, 1972	N/A	None	None
Lead Quench Pot with Natural Gas-Fired Heater (M3-2)	PM and SO_2	Prior to April 14, 1972	N/A	None	None
Lead Contact Pot with Natural Gas-Fired Heater (M4-1)	PM, SO_2, VOM, CO, NO_x, and HAP	February 2000	N/A*	PTE and WESP	Differential Pressure Drop Gauge for the PTE; Flow Meter, Exhaust Gas Temperature Monitor, Differential Pressure Monitor, Secondary Voltage Meter, Secondary Current Meter, and Spark Rate Meter for the WESP
Lead Quench Pot with Natural Gas-Fired Heater (M4-2)	PM, SO_2, VOM, CO, NO_x, and HAP	February 2000	N/A*	PTE and WESP	Differential Pressure Drop Gauge for the PTE; Flow Meter, Exhaust Gas Temperature Monitor, Differential Pressure Monitor, Secondary Voltage Meter, Secondary Current Meter, and Spark Rate Meter for the WESP

* Note: Construction Permit #12070036 issued on July 18, 2012 authorized an emission control project for Magnus 4 Line (M4-1 and M4-2), which involved the construction of a permanent total enclosure (PTE) for these lead pots and a wet electrostatic precipitator (WESP). This project did not result in a modification or reconstruction.

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. <u>Opacity Requirements</u>

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.2.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), for M4-1 and M4-2, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See Section 7.2)

B. Pursuant to 35 IAC 212.322(a), for M2-1, M2-2, M3-1, and M3-2, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c). (See Section 7.2)

C. Pursuant to Construction Permit #99030098, PM emissions from Steel Strap Production shall not exceed the following limits: [T1]

Equipment	(lb/hr)	(Ton/yr)
Contact Pot M4-1	1.32	5.80
Quench Pot M4-2	1.32	5.80
Total		11.60

D. Pursuant to Construction Permit #99030098, PM emissions from the combustion of natural gas shall not exceed the following limits: [T1]

Equipment	(lb/hr)	(Ton/yr)
Contact Pot M4-1	0.04	0.15
Quench Pot M4-2	0.04	0.17
Total		0.32

E. Pursuant to 35 IAC 212.324(b), no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period, with the following exception: The mass emission limit in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 IAC 212.324(b).

ii. Compliance Method (PM Requirements)

Monitoring

A. Pursuant to 35 IAC 212.324(f), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. 35 IAC 212.324 shall not affect the applicability of 35 IAC 201.149. Proper maintenance shall include the following minimum requirements:

I. Visual inspections of air pollution control equipment;

II. Maintenance of an adequate inventory of spare parts; and

III. Expeditious repairs, unless the emission unit is shutdown.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each emission unit listed in Condition 4.2.1, hr/mo and hr/yr.

II. The emissions of PM from each emission unit listed in Condition 4.2.1, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321 or 35 IAC 212.322, as applicable.

C. Pursuant to 35 IAC 212.324(g), the Permittee shall maintain the following records of maintenance and repair:

I. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 IAC 212.324(f).

II. The Permittee shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.

III. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.

IV. Copies of all records required by 35 IAC 212.324 shall be submitted to the Agency within ten (10) working days after a written request by the Agency.

V. The records required under 35 IAC 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.

VI. Upon written request by the Agency, a report shall be submitted to the Agency for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

c. i. Sulfur Dioxide Requirements (SO_2)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

B. Pursuant to Construction Permit #99030098, SO_2 emissions from the combustion of natural gas shall not exceed the following limits: [T1]

Equipment	(lb/Hr)	(Ton/Yr)
Contact Pot M4-1	0.01	0.01

Equipment	(lb/Hr)	(Ton/Yr)
Quench Pot M4-2	0.01	0.01
Total		0.02

ii. Compliance Method (SO_2 Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas, as required by Condition 4.2.2(h)(i)(A). These records may be supplied by the fuel supplier/vendor.

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to SO_2 emissions:

I. The emissions of SO_2 from Contact Pot M4-1 and M4-2, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the applicable limits in Condition 4.2.2(c)(i)(B).

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to Construction Permit #99030098, VOM emissions from the combustion of natural gas shall not exceed the following limits: [T1]

Equipment	(lb/Hr)	(Ton/Yr)
Contact Pot M4-1	0.03	0.11
Quench Pot M4-2	0.03	0.13
Total		0.24

B. Pursuant to 35 IAC 218.301, the Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from Emission Units M2-1, M2-2, M3-1, or M3-2, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material.

ii. Compliance Method (VOM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to VOM emissions:

I. The emissions of VOM from M4-1 and M4-2, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the applicable limits in Condition 4.2.2(d)(i)(A).

II. The emissions of VOM from M2-1, M2-2, M3-1, or M3-2, ton/mo and ton/yr, with supporting calculations.

e. i. Carbon Monoxide Requirements (CO)

A. Pursuant to Construction Permit #99030098, CO emissions from the combustion of natural gas shall not exceed the following limits: [T1]

Equipment	(lb/Hr)	(Ton/Yr)
Contact Pot M4-1	0.39	1.70

Equipment	(lb/Hr)	(Ton/Yr)
Quench Pot M4-2	0.44	1.92
Total		3.62

ii. Compliance Method (CO Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to CO emissions:

I. The emissions of CO from Contact Pot M4-1 and M4-2, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the applicable limits in Condition 4.2.2(e)(i)(A).

f. i. Nitrogen Oxide Requirements (NO_x)

A. Pursuant to Construction Permit #99030098, NO_x emissions from the combustion of natural gas shall not exceed the following limits: [T1]

Equipment	(lb/hr)	(Ton/yr)
Contact Pot M4-1	0.46	2.03
Quench Pot M4-2	0.52	2.29
Total		4.32

ii. Compliance Method (NO_x Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to NO_x emissions:

I. The emissions of NO_x from Contact Pot M4-1 and M4-2, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the applicable limits in Condition 4.2.2(f)(i)(A).

g. i. Hazardous Air Pollutant Requirements (HAP)

A. Pursuant to Construction Permit #99030098, HAP emissions from Steel Strap Production shall not exceed the following limits: [T1]

Equipment	(lb/hr)	(Ton/yr)
Contact Pot M4-1	0.57	2.49
Quench Pot M4-2	0.44	1.91
Total		4.40

ii. Compliance Method (HAP Requirements)

Testing

A. Pursuant to Section 39.5(7)(d)(ii) of the Act, during normal operation, the Permittee shall have the HAP emissions from Contact Pot M4-1 and Quench Pot M4-2 measured as specified below:

I. HAP emissions shall be measured at least once every 5 years, but no later than 9 months from the expiration date of this permit.

II. Measurements of HAP shall be made in accordance with applicable USEPA Test Method(s), specifically Method 12, and also following Condition 7.1 of this permit.

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to HAP emissions:

I. The emissions of HAP from Contact Pot M4-1 and M4-2, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the applicable limits in Condition 4.2.2(f)(i)(A).

h. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, when the Permittee uses natural gas as a fuel for the heaters, pipeline quality natural gas shall be the only fuel fired.

B. Pursuant to Construction Permit #99030098, the production rates and firing rates shall not exceed the following limits: [T1]

Equipment	Process Rate (lb/hr)	Firing Rate (mmBtu/hr)
Contact Pot M4-1	13,235.8	4.64
Quench Pot M4-2	13,235.8	5.22

C. Pursuant to Construction Permit #99030098, the Permittee shall operate the lead contact and lead quench pots without the use of quenching oils. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record of the following:

I. Hours of operation for Contact Pot M4-1 and Quench Pot M4-2.

II. Process rates for Contact Pot M4-1 and Quench Pot M4-2 (lb/day), with supporting calculations demonstrating compliance with the applicable limits in Condition 4.2.2(h)(i)(B).

III. The maximum designed firing rate for the burners on Contact Pot M4-1 and Quench Pot M4-2 (mmBtu/hr).

IV. The amount of steel strapping processed on the Magnus 4 Line (tons/mo and tons/yr, by type, i.e., straight run and re-run).

i. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Lead Contact Pots M2-1 and M3-1 and Lead Quenching Pots M2-2 and M3-2 shall not be operated as a secondary lead process or lead smelter.

B. Pursuant to Construction Permit #12070036, the Lead Contact Pot M4-1 and Lead Quenching Pot M4-2 shall not be operated as a secondary lead process or lead smelter. [T1]

C. Pursuant to Construction Permit #12070036, the permanent total enclosure (PTE) for Lead Contact Pot M4-1 and Lead Quenching Pot M4-2 shall be designed and operated to comply with the criteria for permanent total enclosure in Section 6 of USEPA Method 204, in 40 CFR 51, Appendix M. [T1]

D. Pursuant to Construction Permit #12070036, at all times the Permittee shall, to the extent practicable, maintain and operate Lead Contact Pot M4-1 and Lead Quenching Pot M4-2, including associated permanent total enclosure and WESP, in a manner consistent with good air pollution control practice for minimizing emissions. At a minimum, these practices shall include: [T1]

i. Operation of the lead pots, including associated permanent total enclosure and WESP, in accordance with written operating procedures that address startup and shutdown, as well as normal operation, which procedures shall be developed and maintained by the Permittee and may incorporate the manufacturers' recommended operating instructions.

ii. At all times when the lead pots have the potential for emissions, permanent total enclosure shall be in place except as needed for temporary access to conduct manufacturing operations (e.g., inspection of the lead bath, maintenance of equipment, or addition of lead) or as needed to perform emissions testing to address periods when permanent total enclosure would not be present.

iii. At all times when the lead pots have the potential for emissions except during periods of malfunction or breakdown of the WESP or as necessary for protection of personnel and safe operation of equipment, the WESP shall be operating at a level that is appropriate to control such emissions. For this purpose, in addition to operation during routine manufacturing, the WESP shall be operational during startup, idling and shutdown of the Magnus 4 Line, but may operate at reduced levels as appropriate to control emissions during such periods.

E. Pursuant to Construction Permit #12070036, the Permittee shall handle waste material from the WESP to prevent release of lead to the environment from this material at the plant. [T1]

F. Pursuant to Construction Permit #12070036, the Permittee shall inspect the permanent total enclosure on at least a monthly basis for proper operation and physical integrity and functionality. The Permittee shall maintain a log or other records to document the performance of these inspections and the observed condition and operation of the permanent total enclosure. [T1]

G. Pursuant to Construction Permit #12070036, the Permittee shall operate instrumentation for the pressure drop across the permanent total enclosure (i.e., the differential between the interior and exterior of the enclosure), in inches of water. This instrumentation shall be designed to provide measurements to at least the nearest 0.0005 inches of water. Data from this instrumentation shall either be automatically recorded on an hourly average basis or instantaneous data from this instrumentation shall be manually recorded at least once every 12 hours of operation of the Magnus 4 Line, along with the operating mode of the line and the state of the enclosure. [T1]

H. Pursuant to Construction Permit #12070036, the Permittee shall maintain and operate a continuous monitoring system on the WESP that supplies continuous readings and stores average hourly values for the following operating parameters. If the WESP has more than two electrical fields, electrical data, as specified by Condition 4.2.2(i)(i)(H)(1-3), shall be measured and

recorded for each field in the WESP as well as for the WESP as a whole: [T1]

1. Secondary voltage (volts).

2. Secondary current (amperes).

3. Sparking rate (sparks per minute).

4. Water flow through the recirculation spray header (gallons/hour).

5. Differential pressure across the packed bed (inches of water).

6. Exhaust temperature downstream of the packed bed, either measured inside the WESP or at the outlet of the WESP (°F).

I. Pursuant to Construction Permit #12070036, the Permittee shall operate instrumentation on the pre-scrubber section of the WESP for gas temperature at the discharge of the pre-scrubber or other operating parameter(s) that serve to confirm proper functioning of the pre-scrubber. If data from the above instrumentation is not automatically recorded on an hourly average basis, data from this instrumentation shall be recorded at least once every 12 hours that the WESP is in operation. [T1]

J. Pursuant to Construction Permit #12070036, the Permittee shall operate an alarm or other instrumentation to identify flow through the bypass stack for the WESP. If data from this alarm/instrumentation is not automatically recorded, records shall be kept for periods of flow through the bypass stack based on this alarm/instrumentation, including the time and duration, the operational status of the Magnus 4 line, and the reason for bypass. [T1]

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records related to the WESP:

I. An operating log for the WESP system, which contains the following, as required by Condition 4.2.2(i)(i)(H-J):

1. Secondary voltage (volts).

2. Secondary current (amperes).

3. Sparking rate (sparks per minute).

4. Water flow through the recirculation spray header (gallons/hour).

5. Differential pressure across the packed bed (inches of water).

6. Exhaust temperature downstream of the packed bed, either measured inside the WESP or at the outlet of the WESP (°F).

II. The Permittee shall keep a maintenance and repair log or other records for the WESP system. This log shall list the date and nature of maintenance and repair activities performed on the system.

III. The Permittee shall maintain records that include the following information for each period when the affected lead pots had the potential for emissions that they operated without the WESP:

1. The date, time and duration.

2. The length of time that the affected lead pots operated in the "uncontrolled operation" mode before required control measures were in place or the Magnus 4 Line was shutdown (to resume operation only after required control measures were in place) and an explanation why this time was not shorter, including a description of any mitigation measures that were implemented.

3. A discussion of the probable cause.

4. A description of any preventive measures taken.

IV. A record of the steps taken to prevent the release of lead to the environment during the handling of waste from the WESP.

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records related to the PTE:

I. A record demonstrating that permanent total enclosure meets Section 6 of USEPA Method 204, in 40 CFR 51, Appendix M.

II. A records that includes the following information for each period when the lead pots had the potential for emissions that they operated without the PTE in operation:

1. The date, time and duration.

2. The length of time that the lead pots operated in the "uncontrolled operation" mode before the PTE was restored to operation or the Magnus 4 Line was shutdown (to resume operation only after PTE was restored) and an explanation why this time was not shorter, including a description of any mitigation measures that were implemented.

3. A discussion of the probable cause.

4. A description of any preventive measures taken.

III. A record of monthly PTE inspections, in accordance with Condition 4.2.2(i)(i)(F).

IV. A record of the pressure drop across the PTE, in accordance with Condition 4.2.2(i)(i)(G).

j. **i.** **Future MACT Requirements (40 CFR 63 Subpart DDDDD)**

See Section 5.2 for future requirements for the natural gas-fired process heaters for M2-1, M2-2, M3-1, M3-2, M4-1, and M4-2.

3. Non-Applicability Determinations

a. The Lead Contact and Quench Pots are not subject to the New Source Performance Standards (NSPS) for Secondary Lead Smelters, 40 CFR Part 60 Subpart L, because the source is not a secondary lead smelter, as defined by 40 CFR 60.121(b).

b. The Lead Contact and Quench Pots are not subject to the New Source Performance Standards (NSPS) for Primary Lead Smelters, 40 CFR Part 60 Subpart R, because the source is not a primary lead smelter, as defined by 40 CFR 60.181(a).

c. The Lead Contact and Quench Pots are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Secondary Lead Smelting, 40 CFR Part 63 Subpart X. This is because the lead pots are fed with lead ingots and do not process lead scrap or lead ore.

d. The Lead Contact and Quench Pots are not subject to the NESHAP for Primary Lead Smelting 40 CFR Part 63 Subpart TTT. This is because the lead pots are fed with lead ingots and do not process lead scrap or lead ore.

e. The Lead Contact and Quench Pots are not subject to NESHAP: Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, 40 CFR Part 63 Subpart ZZZZZZ, because the manufacturing of steel strap at the source is not a foundry operation.

f. The heaters for the Lead Contact and Quench Pots are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the heaters are not by definition fuel combustion emission units.

g. The heaters for the Lead Contact and Quench Pots are not subject 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the heaters are not by definition fuel combustion emission units.

h. Lead Contact Pots M2-1 and M3-1 and Lead Quench Pots M2-2 and M3-2 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because Lead Contact Pots M2-1 and M3-1 and Lead Quench Pots M2-2 and M3-2 do not use an add-on control device to achieve compliance with an emission limitation or standard.

i. Lead Contact Pot M4-1 and Lead Quench Pot M4-2 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for SO_2, VOM, CO, or NO_x because Lead Contact Pot M4-1 and Lead Quench Pot M4-2 do not use an add-on control device to achieve compliance with an emission limitation or standard for SO_2, VOM, CO, or NO_x.

j. Lead Contact Pot M4-1 and Lead Quench Pot M4-2 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for PM or HAP because Lead Contact Pot M4-1 and Lead Quench Pot M4-2 do not have potential pre-control device emissions of these applicable regulated air pollutants that equal or exceeds major source threshold level.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. <u>Prompt Reporting</u>

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), 4.2.2(f)(i), 4.2.2(g)(i), 4.2.2(h)(i), and 4.2.2(i)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.3 Strapping Coating Lines and Wax Applicators (Subject to 40 CFR 60 Subpart TT)

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Paint Dip Tank – Magnus 4 Strapping Line* (M4-3)	PM, VOM, and HAP	February 2000	N/A	Thermal Oxidizer	Thermocouple
Electric Paint Drying Oven – Magnus 4 Strapping Line* (M4-4)	PM, VOM, and HAP	February 2000	N/A	Thermal Oxidizer	Thermocouple
Wax Applicator/Electric Dryer – Magnus 4 Strapping Line* (M4-5)	PM, VOM, and HAP	February 2000	N/A	None	None
Wax Applicator/Electric Dryer – 1000# Rewinder (R-1)	PM, VOM, and HAP	July 2001	N/A	None	None
Wax Applicator/Electric Dryer – Print Line (PRINT-1)	PM, VOM, and HAP	June 2001	N/A	None	None
Wax Applicator/Electric Dryer – #2 Slitting Line (SLIT-2)	PM, VOM, and HAP	February 2003	N/A	None	None

* Note: These units make up Magnus 4 Strapping Coating Line.

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall

include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. <u>Particulate Matter Requirements (PM)</u>

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Condition 7.2(a))

B. Pursuant to 35 IAC 212.324(b), no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period, with the following exception: The mass emission limit in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 IAC 212.324(b).

ii. <u>Compliance Method (PM Requirements)</u>

<u>Monitoring</u>

A. Pursuant to 35 IAC 212.324(f), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. 35 IAC 212.324 shall not affect the applicability of 35 IAC 201.149. Proper maintenance shall include the following minimum requirements:

I. Visual inspections of air pollution control equipment, if any;

II. Maintenance of an adequate inventory of spare parts; and

III. Expeditious repairs, unless the emission unit is shutdown.

B. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the strap coating lines, wax applicators, and their associated auxiliary equipment.

Recordkeeping

C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each emission unit listed in Condition 4.3.1, hr/mo and hr/yr.

II. The emissions of PM from each emission unit listed in Condition 4.3.1, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321.

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record for the inspections required by Condition 4.3.2(b)(ii)(B). These records shall include the following, at a minimum:

I. Date and time inspections were performed,

II. Name(s) of inspection personnel,

III. Identification of equipment being inspected,

IV. Findings of the inspections,

V. Operation and maintenance procedures, and

VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

c. i. Sulfur Dioxide Requirements (SO_2)

A. Pursuant to 35 IAC 214.301, for any natural gas-fired oven/dryer, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

ii. Compliance Method (SO_2 Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas, as required by Condition 4.3.2(f). These records may be supplied by the fuel supplier/vendor.

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 40 CFR 60.462(a)(1), the Permittee shall not cause to be discharged into the atmosphere more than 0.28 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month.

B. Pursuant to 35 IAC 218.204(d), the Permittee shall not apply at any time any coil coating in which the VOM content exceeds the following emission limitations:

(kg/l)	(lb/gal)
0.20	1.7

C. Pursuant to Construction Permit #99030098, VOM emissions from Magnus 4 Strapping Coating Line shall not exceed the following limits: [T1]

(Tons/Mo)	(Tons/Yr)
2.30	13.80

D. Pursuant to Construction Permit #04100019, VOM emissions from Printing Line (PRINT-1) shall not exceed 0.14 ton/year.

E. Pursuant to Construction Permit #03010025, VOM emissions from #2 Slitting Line (SLIT-2) shall not exceed 0.14 ton/year.

ii. Compliance Method (VOM Requirements)

Monitoring/Testing

A. Pursuant to 40 CFR 60.463(b), the Permittee shall conduct a performance test for each calendar month for each affected facility in accordance with the following:

I. Pursuant to 40 CFR 60.463(c)(1), to determine the monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied, the Permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Illinois EPA may require the Permittee who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The Permittee shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the Permittee shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Illinois EPA.

B. Pursuant to 40 CFR 60.466(a), the reference methods in 40 CFR 60, Appendix A, except as provided under 40 CFR 60.8(b), shall be used to determine compliance with 40 CFR 60.462 as follows:

I. Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne

coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24.

C. Pursuant to 40 CFR 60.466(b), for Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

D. Pursuant to 40 CFR 60.464(a), where compliance with the numerical limit specified in 40 CFR 60.462(a)(1) is achieved through the use of low VOC-content coatings without the use of emission control devices, the Permittee shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in 40 CFR 60.463.

Recordkeeping

E. Pursuant to 40 CFR 60.465(e), the Permittee shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable.

F. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each coating line; and

ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.

G. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to VOM emissions:

I. The VOM emissions from Magnus 4 Strapping Coating Line, tons/mo and tons/yr, with supporting calculations, which address the applicable limits in Condition 4.3.2(d)(i)(C).

II. The VOM emissions from PRINT-1 and SLIT-2, tons/mo and tons/yr, with supporting calculations and documentation.

e. i. Hazardous Air Pollutant Requirements (HAP)

A. Pursuant to 40 CFR 63.5120(a)(2), the Permittee shall limit organic HAP emissions to no more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period.

B. Pursuant to Construction Permit #99030098, HAP emissions from Magnus 4 Strapping Coating Line shall not exceed the following limits: [T1]

(Tons/Mo)	(Tons/Yr)
1.62	9.74

C. Pursuant to Construction Permit #99030098, HAP emissions from Paint Dip Tank M4-3, Drying Oven M4-4, and Wax Applicator/Dryer M4-5 shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. [T1]

ii. Compliance Method (HAP Requirements)

Monitoring

A. Pursuant to 40 CFR 63.5120(b) and 40 CFR 63.5170, the Permittee shall demonstrate compliance with the 40 CFR 63.5120(a)(2) using one of the following compliance methods:

I. 40 CFR 63.5170(a) – Use of "as purchased" compliant coatings

If the Permittee elects to use coatings that individually meet the organic HAP emission limit in 40 CFR 63.5120(a)(2) as-purchased, to which the Permittee will not add HAP during distribution or application, the Permittee must demonstrate that each coating material applied during the 12-month compliance period contains no more than 0.046 kg HAP per liter of solids on an as-purchased basis.

1. Determine the organic HAP content for each coating material in accordance with 40 CFR 63.5160(b) and the volume solids content in accordance with 40 CFR 63.5160(c).

2. Combine these results using Equation 1, as listed below, and compare the result to the organic HAP emission limit in 40 CFR 63.5120(a)(2) to demonstrate that each coating material contains no more organic HAP than the limit.

$$H_{siap} = \frac{C_{hi} D_i}{V_{si}} \qquad (Eq.\ 1)$$

Where:

H_{siap} = as-purchased, organic HAP to solids ratio of coating material, i, kg organic HAP/liter solids applied.

C_{hi} = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

D_i = density of coating material, i, kg/l.

V_{si} = volume fraction of solids in coating, i, l/l.

II. 40 CFR 63.5170(b)(1) – Use of “as applied” compliant coatings

If the Permittee chooses to use “as-applied” compliant coatings, the Permittee must demonstrate that the average of each coating material applied during the 12-month compliance period contains no more than 0.046 kg of organic HAP per liter of solids applied in accordance with 40 CFR 63.5170(b)(1).

1. To demonstrate that the average organic HAP content on the basis of solids applied for each coating material applied, $_{Hsi\ yr}$, is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation 2, as listed below:

$$H_{Si\,yr} = \frac{\sum_{y=1}^{12}\left[V_i D_i C_{ahi} + \sum_{j=1}^{q} V_j D_j C_{hij}\right]}{\sum_{y=1}^{12} V_i V_{si}} \qquad (Eq.\ 2)$$

Where:

$H_{si\ yr}$ = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of material, i, kg organic HAP/liter solids applied.

V_i = volume of coating material, i, l.

D_i = density of coating material, i, kg/l.

C_{ahi} = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

V_j = volume of solvent, j, l.

D_j = density of solvent, j, kg/l.

C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

V_{si} = volume fraction of solids in coating, i, l/l.

y = identifier for months.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

III. 40 CFR 63.5170(b)(2) – Use of “as applied” compliant coatings

In the alternative to Condition 4.3.2(e)(ii)(A)(II), if the Permittee chooses to use “as-applied” compliant coatings, the Permittee must demonstrate that the average of all coating materials applied during the 12-month compliance period contain no more than 0.046 kg of organic HAP per liter of solids applied in accordance with 40 CFR 63.5170(b)(2).

1. To demonstrate that the average organic HAP content on the basis of solids applied, $H_{S\ yr}$, of all coating materials applied is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation, as listed below:

$$H_{Syr} = \frac{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i D_i C_{ahi} + \sum_{j=1}^{q} V_j D_j C_{hij}\right]}{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i V_{si}\right]} \qquad (Eq.\ 3)$$

Where:

$H_{S\ yr}$ = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of all materials applied, kg organic HAP/liter solids applied.

V_i = volume of coating material, i, l.

D_i = density of coating material, i, kg/l.

C_{ahi} = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

V_j = volume of solvent, j, l.

D_j = density of solvent, j, kg/l.

C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

V_{si} = volume fraction of solids in coating, i, l/l.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

y = identifier for months.

Recordkeeping

B. Pursuant to 40 CFR 63.5190(a), the Permittee shall maintain the following records:

I. Records of the coating lines on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) the Permittee used each option.

II. Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR 63 Subpart SSSS, including:

1. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(b);

2. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c);

3. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d); and

III. Records specified in 40 CFR 63.10(b)(3).

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to HAP emissions:

I. The HAP emissions from Magnus 4 Strapping Coating Line, tons/mo and tons/yr, with supporting calculations, which address the applicable limits in Condition 4.3.2(e)(i)(B).

II. The combined HAP emissions from Paint Dip Tank M4-3, Drying Oven M4-4, and Wax Applicator/Dryer M4-5, with supporting calculations, which address the applicable limits in Condition 4.3.2(e)(i)(C).

f. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, when natural gas is used as a fuel by an oven/dryer, pipeline quality natural gas shall be the only fuel fired.

B. Pursuant to Construction Permit #99030098, operation of Magnus 4 Strapping Coating Line shall not exceed the following limits: [T1]

I. Material Usage and HAP Content:

Material	Usage (Gal/Mo)	Usage (Gal/Yr)	HAP Content (Lbs/Gal)
Coating & Solvent	7,660	45,960	1.2

C. Pursuant to Construction Permit #99030098, Drying Ovens M4-4 and M4-5 shall only be operated with electricity to produce heat. [T1]

ii. Compliance Method (Operational and Production Requirements)

Monitoring

Note: Monitoring of HAP content is required by 4.3.2(e)(ii).

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the following:

I. HAP content of coatings and solvents used on Magnus 4 Strapping Coating Line (lbs/gal).

II. Usage of coatings and solvents used on Magnus 4 Strapping Coating Line (gal/mo and gal/yr).

3. Non-Applicability Determinations

a. The natural gas-fired drying ovens on Electric Paint Drying Oven – Magnus 4 Strapping Line* (M4-4) is not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because Electric Paint Drying Oven – Magnus 4 Strapping Line* (M4-4) is not by definition a fuel combustion emission unit.

b. Pursuant to 35 IAC 218.209, no owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204.

c. Wax Applicator/Electric Dryer – Magnus 4 Strapping Line (M4-5), Wax Applicator/Electric Dryer – 1000# Rewinder (R-1), Wax Applicator/Electric Dryer – Print Line (PRINT-1), and Wax Applicator/Electric Dryer – #2 Slitting Line (SLIT-2) are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the these

emissions units do not use an add-on control device to achieve compliance with an emission limitation or standard.

d. Paint Dip Tank – Magnus 4 Strapping Line (M4-3) and Electric Paint Drying Oven – Magnus 4 Strapping Line (M4-4) are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the these emission units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i), 4.3.2(d)(i), 4.3.2(e)(i), and 4.3.2(f)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. Federal Reporting

i. Pursuant to 40 CFR 60.465(c), the Permittee shall identify, record, and submit a written report to the Illinois EPA every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Illinois EPA semiannually.

ii. Pursuant to 40 CFR 63.5180(d), the Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Permittee must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.

iii. Pursuant to 40 CFR 63.5180(g), the Permittee must submit semi-annual compliance reports containing the information specified in 40 CFR 63.5180(g)(1) and (2), as applicable.

iv. Pursuant to 40 CFR 63.5180(h), the Permittee must submit, for each deviation occurring at an affected source where the Permittee is not using CEMS to comply with the standards in 40 CFR 63 Subpart SSSS, the semi-annual compliance report containing the information in 40 CFR 63.5180(g)(2)(i) through (iv) and the information in 40 CFR 63.5180(h)(1) through (3), as applicable.

4.4 Strapping Coating Lines and Wax Applicators

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Paint Applicator – Apex Strapping Line (A-2)	PM, VOM, and HAP	Prior to April 14, 1972	N/A	None	None
Electric Paint Drying Oven – Apex Strapping Line (A-3)	PM, VOM, and HAP	February 1985*	N/A	None	None
Wax Applicator/Electric Dryer – Apex Strapping Line (A-4)	PM, VOM, and HAP	Prior to April 14, 1972	N/A	None	None
Paint Dip Tank – Magnus 2 Strapping Line (M2-3)	PM, VOM, and HAP	Prior to April 14, 1972	N/A	None	None
Natural Gas-Fired Paint Drying Oven – Magnus 2 Strapping Line (M2-4)	PM, VOM, SO_2, and HAP	Prior to April 14, 1972	N/A	None	None
Wax Applicator/Electric Dryer – Magnus 2 Strapping Line (M2-5)	PM, VOM, and HAP	Prior to April 14, 1972	N/A	None	None
Paint Dip Tank – Magnus 3 Strapping Line (M3-3)	PM, VOM, and HAP	Prior to April 14, 1972	N/A	None	None
Natural Gas-Fired Paint Drying Oven – Magnus 3 Strapping Line (M3-4)	PM, VOM, SO_2, and HAP	Prior to April 14, 1972	N/A	None	None
Wax Applicator/Electric Dryer – Magnus 3 Strapping Line (M3-5)	PM, VOM, and HAP	Prior to April 14, 1972	N/A	None	None

* Note: The construction of the Electric Paint Drying Oven – Apex Strapping Line (A-3) did not "modify" or result in the "reconstruction" of the Apex coating line in a manner which would trigger the requirements of 40 CFR Part 60 Subpart TT.

2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions

are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.322(a), for M2-1, M2-2, M3-1, and M3-2, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c). (See Section 7.2)

B. Pursuant to 35 IAC 212.324(b), no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period, with the following exception: The mass emission limit in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 IAC 212.324(b).

ii. Compliance Method (PM Requirements)

Monitoring

A. Pursuant to 35 IAC 212.324(f), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. 35 IAC 212.324 shall not affect the applicability of 35 IAC 201.149. Proper maintenance shall include the following minimum requirements:

I. Visual inspections of air pollution control equipment, if any;

II. Maintenance of an adequate inventory of spare parts; and

III. Expeditious repairs, unless the emission unit is shutdown.

B. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the strap coating lines, wax applicators, and their associated auxiliary equipment.

Recordkeeping

C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each emission unit listed in Condition 4.4.1, hours/mo and hours/yr.

II. The emissions of PM from each emission unit listed in Condition 4.4.1, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.322.

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record for the inspections required by Condition 4.4.2(b)(ii)(B). These records shall include the following, at a minimum:

I. Date and time inspections were performed,

II. Name(s) of inspection personnel,

III. Identification of equipment being inspected,

IV. Findings of the inspections,

V. Operation and maintenance procedures, and

VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

c. i. Sulfur Dioxide Requirements (SO_2)

A. Pursuant to 35 IAC 214.301, for any natural gas-fired oven/dryer, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

ii. Compliance Method (SO_2 Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas, as required by Condition 4.4.2(f). These records may be supplied by the fuel supplier/vendor.

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.204(d), the Permittee shall not apply at any time any coil coating in which the VOM content exceeds the following emission limitations:

(kg/l)	(lbs/gal
0.20	1.7

ii. Compliance Method (VOM Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, the VOM content of coatings used on the coating lines shall be determined as follows:

I. The VOM content of representative coatings “as applied” on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

II. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee’s records directly reflect the application of such material and separately account for any additions of solvent.

III. Such testing shall be performed anytime when a new coating being introduced to the affected coating line. For existing coatings, the Permittee shall annually confirm VOM content from the previous test and records of these verifications shall be kept on site for any inspection review.

Recordkeeping

A. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

I. The name and identification number of each coating as applied on each coating line; and

II. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.

e. i. Hazardous Air Pollutant Requirements (HAP)

A. Pursuant to 40 CFR 63.5120(a)(2), the Permittee shall limit organic HAP emissions to no more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period.

ii. Compliance Method (HAP Requirements)

Monitoring

A. Pursuant to 40 CFR 63.5120(b) and 40 CFR 63.5170, the Permittee shall demonstrate compliance with the 40 CFR 63.5120(a)(2) using one of the following compliance methods:

I. 40 CFR 63.5170(a) – Use of "as purchased" compliant coatings

If the Permittee elects to use coatings that individually meet the organic HAP emission limit in 40 CFR 63.5120(a)(2) as-purchased, to which the Permittee will not add HAP during distribution or application, the Permittee must demonstrate that each coating material applied during the 12-month compliance period contains no more than 0.046 kg HAP per liter of solids on an as-purchased basis.

1. Determine the organic HAP content for each coating material in accordance with 40 CFR 63.5160(b) and the volume solids content in accordance with 40 CFR 63.5160(c).

2. Combine these results using Equation 1, as listed below, and compare the result to the organic HAP emission limit in 40 CFR 63.5120(a)(2) to demonstrate that each coating material contains no more organic HAP than the limit.

$$H_{siap} = \frac{C_{hi} D_i}{V_{si}} \qquad (Eq.\ 1)$$

Where:

H_{siap} = as-purchased, organic HAP to solids ratio of coating material, i, kg organic HAP/liter solids applied.

C_{hi} = organic HAP content of coating material, i, expressed as a weight-fraction, kg/kg.

D_i = density of coating material, i, kg/l.

V_{si} = volume fraction of solids in coating, i, l/l.

II. 40 CFR 63.5170(b)(1) – Use of "as applied" compliant coatings

If the Permittee chooses to use "as-applied" compliant coatings, the Permittee must demonstrate that the average of each coating material applied during the 12-month compliance period contains no more than 0.046 kg of organic HAP per liter of solids applied in accordance with 40 CFR 63.5170(b)(1).

1. To demonstrate that the average organic HAP content on the basis of solids applied for each coating material applied, $H_{si\ yr}$, is less than 0.046 kg HAP per liter solids applied for

the 12-month compliance period, use Equation 2, as listed below:

$$H_{si\ yr} = \frac{\sum_{y=1}^{12}\left[V_i D_i C_{ahi} + \sum_{j=1}^{q} V_j D_j C_{hij}\right]}{\sum_{y=1}^{12} V_i V_{si}} \qquad (Eq.\ 2)$$

Where:

$H_{si\ yr}$ = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of material, i, kg organic HAP/liter solids applied.

V_i = volume of coating material, i, l.

D_i = density of coating material, i, kg/l.

C_{ahi} = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

V_j = volume of solvent, j, l.

D_j = density of solvent, j, kg/l.

C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

V_{si} = volume fraction of solids in coating, i, l/l.

y = identifier for months.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

III. 40 CFR 63.5170(b)(2) – Use of “as applied” compliant coatings

In the alternative to Condition 4.4.2(e)(ii)(A)(II), if the Permittee chooses to use “as-applied” compliant coatings, the Permittee must demonstrate that the average of all coating materials applied during the 12-month compliance period contain no more than 0.046 kg of organic HAP per liter of solids applied in accordance with 40 CFR 63.5170(b)(2).

1. To demonstrate that the average organic HAP content on the basis of solids applied, $H_{S\ yr}$, of all coating materials applied is less than 0.046 kg HAP per liter solids applied for the 12-month compliance period, use Equation, as listed below:

$$H_{S\,yr} = \frac{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i D_i C_{ahi} + \sum_{j=1}^{q} V_j D_j C_{hij}\right]}{\sum_{y=1}^{12}\left[\sum_{i=1}^{p} V_i V_{si}\right]} \qquad \text{(Eq. 3)}$$

Where:

$H_{S\,yr}$ = average for the 12-month compliance period, as-applied, organic HAP to solids ratio of all materials applied, kg organic HAP/liter solids applied.

V_i = volume of coating material, i, l.

D_i = density of coating material, i, kg/l.

C_{ahi} = monthly average, as-applied, organic HAP content of solids-containing coating material, i, expressed as a weight fraction, kilogram (kg)/kg.

V_j = volume of solvent, j, l.

D_j = density of solvent, j, kg/l.

C_{hij} = organic HAP content of solvent, j, added to coating material, i, expressed as a weight fraction, kg/kg.

V_{si} = volume fraction of solids in coating, i, l/l.

p = number of different coating materials applied in a month.

q = number of different solvents, thinners, reducers, diluents, or other non-solids-containing coating materials applied in a month.

y = identifier for months.

Recordkeeping

B. Pursuant to 40 CFR 63.5190(a), the Permittee shall maintain the following records:

I. Records of the coating lines on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) the Permittee used each option.

II. Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR 63 Subpart SSSS, including:

1. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(b);

2. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c);

3. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d); and

III. Records specified in 40 CFR 63.10(b)(3).

f. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, when natural gas is used as a fuel by an oven/dryer, pipeline quality natural gas shall be the only fuel fired.

ii. Compliance Method (Operational and Production Requirements)

See Condition 4.4.2(c)(ii)(A) for periodic monitoring for natural gas.

g. **i. Future MACT Requirements (40 CFR 63 Subpart DDDDD)**

See Section 5.2 for future requirements for the natural gas-fired process heaters for M2-4 and M3-4.

3. Non-Applicability Determinations

a. The Paint Applicator – Apex Strapping Line (A-2), Wax Applicator/Electric Dryer – Apex Strapping Line (A-4), Paint Dip Tank – Magnus 2 Strapping Line (M2-3), Wax Applicator/Electric Dryer – Magnus 2 Strapping Line (M2-5), Paint Dip Tank – Magnus 3 Strapping Line (M3-3), and Wax Applicator/Electric Dryer – Magnus 3 Strapping Line (M3-5) are not subject to the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR Part 60 Subpart TT, because these emission units have not been constructed, modified, or reconstructed after January 5, 1981.

b. The Electric Paint Drying Oven – Apex Strapping Line Drying Oven (A-3) is not subject to the NSPS for Metal Coil Surface Coating, 40 CFR Part 60 Subpart TT, because the construction of the unit did not “modify” or result in the “reconstruction” of the Apex coating line, as those terms are defined in the regulation.

c. Natural Gas-Fired Paint Drying Oven – Magnus 2 Strapping Line (M2-4) and Natural Gas-Fired Paint Drying Oven – Magnus 3 Strapping Line (M3-4) are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because these drying ovens are not by definition a fuel combustion emission unit.

d. Pursuant to 35 IAC 218.209, no owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204.

e. The Strapping Coating Lines and Wax Applicators are not subject to 35 IAC 212.324(b), because the mass emission limits contained in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter, pursuant to 35 IAC 212.324(d).

f. The emission units, as identified in 4.4.1, are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the these emissions units do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), 4.4.2(d)(i), 4.4.2(e)(i), and 4.4.2(f)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. Federal Reporting

i. Pursuant to 40 CFR 63.5180(d), the Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Permittee must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.

ii. Pursuant to 40 CFR 63.5180(g), the Permittee must submit semi-annual compliance reports containing the information specified in 40 CFR 63.5180(g)(1) and (2), as applicable.

iii. Pursuant to 40 CFR 63.5180(h), the Permittee must submit, for each deviation occurring at an affected source where the Permittee is not using CEMS to comply with the standards in 40 CFR 63 Subpart SSSS, the semi-annual compliance report containing the information in 40 CFR 63.5180(g)(2)(i) through (iv) and the information in 40 CFR 63.5180(h)(1) through (3), as applicable.

4.5 Punch Press Department

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Punch Press Department #1 – 36 Machines (PPD-1)	PM and VOM	Prior to January 1, 1994	N/A	None	None
Punch Press Department #2 – 10 Machines (PPD-2)	PM and VOM	Prior to July 1, 2001	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum : date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.5.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the above limitation shall apply only to photochemically reactive material.

B. Pursuant to Construction Permit #01020025, VOM emissions from the Punch Press Department #2 shall not exceed the following limits: [T1]

	VOM Emissions (Ton/Mo)	(Ton/Yr)
Department #2	0.32	3.17

C. Pursuant to Construction Permit #95040106, VOM emissions from Punch Press Department #1 shall not exceed 1.17 tons/month and 11.68 tons/year. [T1]

ii. Compliance Method (VOM Requirements)

Recordkeeping

A. Pursuant to Sections 39.5(7) (b) and (e) of the Act, the Permittee shall maintain records to demonstrate that maximum organic material discharge from the cold rolling mill complies with the requirements of Condition 4.5.2(b)(i)(A).

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to VOM emissions:

I. The emissions of VOM from each emission unit in the punch press department, lb/mo and ton/yr (12 month rolling average), with supporting calculations, which address the applicable limits in Condition 4.5.2(b)(i)(B).

c. i. Operational and Production Requirements

A. Pursuant to Construction Permit #01020025, Vanishing Oil usage from the punch press departments shall not exceed 400 gallons/month and 4,000 gallons/year and 100 gallons/month and 1,000 gallons/year, respectively for Departments 1 and 2. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

B. Pursuant to Construction Permit #01020025, the VOM content of vanishing oil used in the affected punch press departments shall not exceed 6.34 lbs/gallons. [T1]

C. Pursuant to Construction Permit #95040106, usage of VOM containing material (vanishing oil) for Punch Press Department #1 shall not exceed 1.17 tons/month and 11.68 tons/year. [T1]

ii. Compliance Method (Operational and Production Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall determine the VOM content of the vanishing oil as follows:

I. The VOM content of representative vanishing oil shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

II. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.

III. Such testing shall be performed anytime when a new vanishing oil is being introduced to punch press department. For existing vanishing oil(s), the Permittee shall annually confirm VOM content from the previous test and records of these verifications shall be kept on site for any inspection review.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall collect and record all of the following information each day for the punch press department and maintain the information at the source for a period of three years:

I. The name and identification number of each vanishing oil used in the punch press department;

II. The amount of vanishing oil used by the punch press department, gal/mo and gal/yr; and

III. The weight of VOM per volume of each vanishing oil (minus water and any compounds which are specifically exempted from the definition of VOM) as used each day in the punch press department, in lbs/gallons.

3. Non-Applicability Determinations

a. The punch press department is not subject to 35 IAC 212.321/322 because there are no PM emissions present in this operation.

b. The emission units in the punch press department are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

a. **Operational Flexibility**

i. The Permittee is authorized to make the following physical or operational change with respect to the affected punch press departments without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for the activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

A. Changes in raw materials (vanishing oil), as long as such changes do not cause a violation of Conditions 4.5.2(b)(i)(A–C) and 4.5.2(c)(i)(A–C).

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), and 4.5.2(c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.6 Grit Seal Lines

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Grit Seal Line #1 (GS-1)	PM	Prior to April 1972	N/A	Cyclone (C-1)	None
Grit Seal Line #2 (GS-2)	PM	Prior to April 1972	N/A	Cyclone (C-1)	None

2. Applicable Requirements

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.322(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c). (See Section 7.2)

B. Pursuant to 35 IAC 212.324(b), no person shall cause or allow the emission into the atmosphere, of PM_{10} from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period, with the following exception: The mass emission limit in 35 IAC 212.324(b) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this subsection is not a defense finding of a violation of the mass emission limits contained in 35 IAC 212.324(b).

C. Pursuant to Permit #88020079, emissions of particulate matter from Grit Seal Lines #1 and 2 shall not exceed 11 tons/yr. This limit is based on continuous operation of the two lines. [T1]

ii. Compliance Method (PM Requirements)

Monitoring

A. Pursuant to 35 IAC 212.324(f), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. 35 IAC 212.324 shall not affect the applicability of 35 IAC 201.149. Proper maintenance shall include the following minimum requirements:

I. Visual inspections of air pollution control equipment;

II. Maintenance of an adequate inventory of spare parts; and

III. Expeditious repairs, unless the emission unit is shutdown.

B. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the grit seal lines and its associated auxiliary equipment.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions:

I. A file containing the method used by the Permittee to determine emissions of PM, with supporting documentation.

II. The emissions of PM, tons/mo and tons/yr (12 month rolling average, calculated at least monthly), with supporting calculations, which demonstrate compliance with the applicable requirements (lb/hr) in Condition 4.6.2(b)(i)(A), and tons/yr in Condition 4.6.2(b)(i)(C).

D. Pursuant to 35 IAC 212.324(g), the Permittee shall maintain the following records of maintenance and repair:

I. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 IAC 212.324(f).

II. The Permittee shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.

III. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.

IV. Copies of all records required by 35 IAC 212.324 shall be submitted to the Agency within ten (10) working days after a written request by the Agency.

V. The records required under 35 IAC 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.

VI. Upon written request by the Agency, a report shall be submitted to the Agency for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record for the inspections required by Condition 4.6.2(b)(ii)(B). This records shall include the following, at a minimum:

I. Date and time inspections were performed,

II. Name(s) of inspection personnel,

III. Identification of equipment being inspected,

IV. Findings of the inspections,

V. Operation and maintenance procedures, and

VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

c. i. Operational and Production Requirements

A. Pursuant to Permit #88020079, the aluminum oxide grit applied to the steel substrate on Grit Seal Lines #1 and 2 shall not exceed 100 lbs/hr, combined. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record of the following:

I. The amount of aluminum oxide grit applied to the steel substrate on Grit Seal Lines #1 and 2 (tons/month and tons/year).

II. The hours of operation of Grit Seal Lines #1 and 2 (hours/month and hours/year).

3. Non-Applicability Determinations

a. The Grit Seal Lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the Grit Seal Lines do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.6.2(a)(i), 4.6.2(b)(i), and 4.6.2(c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.7 Boilers

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
8.4 mmBtu/hr Natural Gas-Fired Boiler #1 (B-1)	PM	Prior to April 14, 1972	N/A	None	None
8.4 mmBtu/hr Natural Gas-Fired Boiler #2 (B-2)	PM	Prior to April 14, 1972	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.7.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, when natural gas is used as a fuel by a boiler, pipeline quality natural gas shall be the only fuel fired.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas. These records may be supplied by the fuel supplier/vendor.

c. i. Future MACT Requirements (40 CFR 63 Subpart DDDDD)

See Section 5.2 for future requirements for the natural gas-fired boilers, B-1 and B-2.

3. Non-Applicability Determinations

a. The boilers are not subject to 40 CFR Part 60 Subpart Dc, because each boiler has a maximum designed heat input capacity of less than 10 mmBtu/hr.

b. The boilers are not subject to 35 IAC 212.322, because the boilers are not by definition process emission units.

c. The boilers are not subject to 35 IAC 214.301, because the boilers are not by definition process emission units.

d. The boilers are not subject to 35 IAC 216.121, because the actual heat input of each boiler is less than 2.9 MW (10 mmBtu/hr).

e. The boilers are not subject to 35 IAC 217.141, because the boilers do not have an actual heat input equal to or greater than 250 mmBtu/hr.

f. The boilers are not subject to the requirements of 35 IAC 218.301 and 302, Use of Organic Material, because, pursuant to 35 IAC 218.303, these regulations shall not apply to fuel combustion emission sources.

g. The space heaters are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the space heaters do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.7.2(a)(i) and 4.7.2(b)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.8 Space Heaters

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
4.126 mmBtu/hr Natural Gas-Fired Heater #1 (H-1)	PM	Prior to April 14, 1972	N/A	None	None
3.240 mmBtu/hr Natural Gas-Fired Heater #2 (H-2)	PM	Prior to April 14, 1972	N/A	None	None
3.240 mmBtu/hr Natural Gas-Fired Heater #3 (H-3)	PM	Prior to April 14, 1972	N/A	None	None
4.400 mmBtu/hr Natural Gas-Fired Heater #4 (H-4)	PM	Prior to April 14, 1972	N/A	None	None
4.400 mmBtu/hr Natural Gas-Fired Heater #5 (H-5)	PM	Prior to April 14, 1972	N/A	None	None
4.400 mmBtu/hr Natural Gas-Fired Heater #6 (H-6)	PM	Prior to April 14, 1972	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.8.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a

description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. <u>Operational and Production Requirements</u>

A. Pursuant to Section 39.5(7)(a) of the Act, when natural gas is used as a fuel by a heater, pipeline quality natural gas shall be the only fuel fired.

ii. <u>Compliance Method (Operational and Production Requirements)</u>

<u>Recordkeeping</u>

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas. These records may be supplied by the fuel supplier/vendor.

3. Non-Applicability Determinations

a. The space heaters are not subject to 40 CFR Part 60 Subpart Dc, because the space heaters have a maximum designed heat input capacity of less than 10 mmBtu/hr.

b. The space heaters are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDDD, because the space heaters do not meet the definition of a boiler or process heater as defined by 40 CFR 63.7575, which specifically excludes units used for comfort heat or space heat from these definitions.

c. The space heaters are not subject to 35 IAC 212.322, because the space heaters are not by definition process emission units.

d. The space heaters are not subject to 35 IAC 214.301, because the space heaters are not by definition process emission units.

e. The space heaters are not subject to 35 IAC 216.121, because the actual heat input of each space heater is less than 2.9 MW (10 mmBtu/hr).

f. The space heaters are not subject to 35 IAC 217.141, because the space heaters do not have an actual heat input equal to or greater than 250 mmBtu/hr.

g. The space heaters are not subject to the requirements of 35 IAC 218.301 and 302, Use of Organic Material, because, pursuant to 35 IAC 218.303, these regulations shall not apply to fuel combustion emission sources.

h. The space heaters are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the space heaters do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.8.2(a)(i) and 4.8.2(b)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

4.9 Fugitive PM Emissions

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Vehicular Traffic on Roadways, Parking Lots	PM	–	N/A	None	None
Loading/Unloading Operations	PM	–	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.9.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

B. Pursuant to 35 IAC 212.316(c), no person shall cause or allow fugitive particulate matter emissions from any roadway or parking area to exceed an opacity of 10 percent.

C. Pursuant to 35 IAC 212.316(f), unless an emission unit has been assigned a particulate matter, PM_{10}, or fugitive particulate matter emissions limitation elsewhere in 35 IAC 212.316, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit listed in Condition 4.9.1 in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 12 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, application of wet suppression, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

I. Pursuant to 35 IAC 212.107 (Measurement Method for Visible Emissions), for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. Subpart A of Part 212 shall not apply to 35 IAC 212.301.

II. Pursuant to 35 IAC 212.109 (Measurement Methods for Opacity), except as otherwise provided, and except for the methods of data reduction when applied to 35 IAC 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 IAC 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5 second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.9.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

D. Pursuant to 35 IAC 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 IAC 212.316 shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 IAC 212.316 and shall submit to the Agency an annual report containing a summary of such information.

I. Pursuant to 35 IAC 212.316(g)(2), the records required shall include at least the following:

1. The name and address of the source;

2. The name and address of the owner and/or operator of the source;

3. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;

4. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;

5. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent and, if diluted, percent of concentration, used each day; and

6. A log recording incidents when control measures were not used and a statement of explanation.

II. Pursuant to 35 IAC 212.316(g)(3), copies of all records required by 35 IAC 212.316 shall be submitted to the Agency within ten (10) working days after a written request by the Agency and shall be transmitted to the Agency by a company-designated person with authority to release such records.

III. Pursuant to 35 IAC 212.316(g)(4), the records required by 35 IAC 212.316 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Agency representatives during working hours.

b. i. <u>Particulate Matter Requirements (PM)</u>

A. The affected Fugitive PM Emissions units shall comply with the standard in Condition 3.1(a)(i), which addresses visible emissions of fugitive particulate matter, as defined by 35 IAC 211.2490.

ii. <u>Compliance Method (PM Requirements)</u>

The source shall comply with the monitoring and recordkeeping in Condition 3.1(a)(ii).

c. i. <u>Operational and Production Requirements</u>

A. Pursuant to 35 IAC 212.306, all normal traffic pattern roads and parking facilities which are located on manufacturing property shall be paved or treated with water or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 IAC 212.309, 212.310 and 212.312 (Condition 3.2(a)).

ii. Compliance Method (Operational and Production Requirements)

The source shall comply with the monitoring and recordkeeping in Condition 3.2(a).

3. Non-Applicability Determinations

a. The fugitive emission units are not subject to 35 IAC 212.321 or 212.322 due to the disperse nature of such emission units, such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.

b. The fugitive emission units are not subject to 35 IAC 212.304 as there are no storage piles at the source.

c. The fugitive emission units are not subject to 35 IAC 212.305 as there are no conveyor loading operations to storage piles applicable to 35 IAC 212.304, pursuant to 35 IAC 212.305.

d. The fugitive emission units are not subject to 35 IAC 212.308 as there are no crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations at the source

e. The fugitive emission units are not subject to 35 IAC 212.316(b) as there is no crushing or screening of slag, stone, coke or coal at the source.

f. The fugitive emission units are not subject to 35 IAC 212.316(d) as there are no material storage piles at the source.

g. The fugitive emission units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the emission units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.9.2(a)(i), 4.9.2(b)(i), and 4.9.2(c)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. State Reporting

i. Pursuant to 35 IAC 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of 35 IAC 212.316. This report shall be submitted to the Agency thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

4.10 Iron Phosphate Cleaning Tank

1. Emission Units and Operations

Emission Units	*Pollutants Being Regulated*	*Original Construction Date*	*Modification/ Reconstruction Date*	*Air Pollution Control Devices or Measures*	*Monitoring Devices*
Iron Phosphate Cleaning Tank – Apex Strapping Line with 1.75 mmBtu/hr Natural Gas-Fired Tank Heater (A-1)	PM, SO_2, and VOM	August 1995	2013	None	None

2. Applicable Requirements

For the emission units in Condition 4.10.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b)and 35 IAC 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit or common stack in accordance with Method 22 for visible emissions at least annually during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. I. Pursuant to Section 39.5(7)(b) of the Act, in the event that a Method 9 is performed as required by Condition 4.10.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9, which at a minimum shall include the following:

1. Identification of the operation for which observations were conducted.

2. Date and time of the observations.

3. Name of observer(s).

4. Description of observation condition, including recent weather.

5. Description of the operating conditions of the affected operation.

6. Raw data.

7. Opacity determination.

8. Conclusion.

II. The duration of opacity observations made in accordance with Method 9 shall be at least 30 minutes (five 6 minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 10.0 percent, in which case the observations may cease.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See Section 7.2)

ii. Compliance Method (PM Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions:

I. The hours of operation for each emission unit listed in Condition 4.10.1, hours/mo and hours/yr.

II. The emissions of PM from each emission unit listed in Condition 4.10.1, lbs/mo and tons/yr (12 month rolling average), with supporting calculations, which address the hourly limits of 35 IAC 212.321, as applicable.

c. i. Sulfur Dioxide Requirements (SO_2)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

ii. Compliance Method (SO_2 Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records, which demonstrate that the natural gas quality is equal to pipeline quality natural gas, as required by Condition 4.10.2(e)(i)(A). These records may be supplied by the fuel supplier/vendor.

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and with the following exception: If no odor nuisance exists the above limitation shall apply only to photochemically reactive material.

B. Pursuant to Construction Permit #95040106, the VOM emissions of the tank, determined based on the amount of material added to the tank, shall not exceed 0.40 tons/month and 4.0 tons/year. [T1]

ii. Compliance Method (VOM Requirements)

Recordkeeping

A. Pursuant to Sections 39.5(7) (b) and (e) of the Act, the Permittee shall maintain records to demonstrate that maximum organic material discharge from the Iron Phosphate Tank complies with the requirements of Condition 4.10.2(d)(i)(A & B).

e. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, when the Permittee uses natural gas as a fuel for the heaters, pipeline quality natural gas shall be the only fuel fired.

B. Pursuant to Construction Permit #95040106, the amount of VOM containing cleaning solution added to the tank shall not exceed 3,000 gallons/month* and 29,900 gallons/year. [T1]

* This monthly limit shall not apply in a month when the tank is "dumped", i.e., the entire contents of the tank is replaced, provided that the tank is not dumped more than once in any 12 month period.

C. Pursuant to Construction Permit #95040106, the VOM content of the cleaning solution added to the tank shall not exceed 2.75 percent by weight. [T1]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:

I. The amount of VOM containing cleaning solution added to the tank, gallons/mo and gallons/yr.

II. A records of any months which a tank is "dumped".

III. The VOM content of the cleaning solution added to the tank, in percent by weight.

f. **i. Future MACT Requirements (40 CFR 63 Subpart DDDDD)**

See Section 5.2 for future requirements for natural gas-fired process heaters.

3. Non-Applicability Determinations

a. The Iron Phosphate Cleaning Tank is not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the Iron Phosphate Cleaning Tank is not by definition a fuel combustion emission unit.

b. The Iron Phosphate Cleaning Tank is not subject 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the Iron Phosphate Cleaning Tank is not by definition a fuel combustion emission unit.

c. The Iron Phosphate Cleaning Tank is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the Iron Phosphate Cleaning Tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:

I. Requirements in Conditions 4.10.2(a)(i), 4.10.2(b)(i), 4.10.2(c)(i), 4.10.2(d)(i), and 4.10.2(e)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

Section 5 – Additional Title I Requirements

5.1 Title I Requirements

This sub-Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this sub-Section.

5.2 Future MACT Requirements (40 CFR 63 Subpart DDDDD) – Natural Gas-Fired Boilers & Space Heaters

In addition to the requirements in Sections 4.2, 4.4, and 4.7 the existing natural gas-fired process heaters and boilers are subject to the following requirements on and after the compliance date specified below:

1. Future Compliance Date

a. Pursuant to 40 CFR 63.7495(b), the Permittee shall comply with the provisions of 40 CFR 63 Subpart DDDDD no later than January 31, 2016, except as provided in 40 CFR 63.6(i).

2. Work Practice Standards

a. i. Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3, for boilers and process heaters with heat input capacity of less than 10 million Btu per hour, but greater than 5 million Btu per hour, conduct a tune-up of each boiler and process heater biennially as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(d), each biennial tune-up must be no more than 25 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

ii. Pursuant to 40 CFR 63.7500(a)(1) and 40 CFR 63 Subpart DDDDD Table 3, for boilers and process heaters with a heat input capacity of less than or equal to 5 million Btu per hour designed to burn gas 1, conduct a tune-up of each boiler and process heater every 5 years as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(d), each 5 year tune-up must be no more than 61 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

b. Pursuant to 40 CFR 63.7540(a)(11) and 40 CFR 63.7540(a)(12), the Permittee must conduct each tune-up in accordance with 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(v), each tune-up shall consist of:

i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown). If entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment.

ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available.

iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown).

iv. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer’s specifications, if available.

v. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

c. Compliance Method (NESHAP Requirements)

Recordkeeping

i. Pursuant to 40 CFR 63.7540(a)(10)(vi)(A) through (C), maintain records of each tune-up as follows:

A. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load before and after the adjustments of the boiler.

B. A description of any corrective actions taken as a part of the combustion adjustment.

C. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

ii. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the reporting requirements of 40 CFR 63.7550.

3. Notifications

a. Pursuant to 40 CFR 63.7545, the Permittee shall submit the following notifications to the Illinois EPA, Compliance Section:

i. Include with the Notification of Compliance Status (40 CFR 63.9(h)(2)) a signed certification that the energy assessment was completed according to 40 CFR 63 Subpart DDDDD Table 3 and is an accurate depiction of the source, pursuant to 40 CFR 63.7530(e).

4. Reports

a. Pursuant to 40 CFR 63.7550, the Permittee shall comply with applicable compliance reports on the compliance date established above.

Section 6 – Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

Insignificant Activity	*Number of Units*	*Insignificant Activity Category*
Generac Standby Emergency Generators – Natural Gas-Fired	3	35 IAC 201.210(a)(15)

a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

i. 40 CFR 63 Subpart ZZZZ – Generac Standby Emergency Generators – Natural Gas-Fired

A. The Permittee shall comply with the applicable requirements of 40 CFR 63 Subpart ZZZZ, which include, but is not limited to, the following:

I. Pursuant to 40 CFR 63.6605(a), the Permittee shall be in compliance with the applicable operating limitations and other requirements in 40 CFR Part 63, Subpart ZZZZ, at all times. The Permittee shall meet applicable compliance and reporting requirements as specified in 40 CFR 63.6640(a & b), the applicable monitoring, collection, operation, and maintenance requirements as specified in 40 CFR 63.6625, the applicable recordkeeping requirements as specified in 40 CFR 63.6655, and the specific requirements as listed below.

II. Pursuant to 40 CFR 63.6602, the Permittee shall comply with the applicable requirements in 40 CFR Part 63, Subpart ZZZZ Table 2c, condition 6 as follows:

1. Change oil and filter every 500 hours of operation or annually, whichever comes first;

2. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

III. Pursuant to 40 CFR 63.6625(h), the Permittee must minimize the engine’s time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

IV. Pursuant to 40 CFR 63.6640, the Permittee shall fulfill the following work or management practices, as listed in 40 CFR 63, Subpart ZZZZ Table 6, condition 9:

1. Operating and maintaining the stationary RICE according to the manufacturer’s emission-related operation and maintenance instructions; or

2) Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

B. For the engines subject to 40 CFR 60 Subpart ZZZZ, the Permittee shall comply with the applicable reporting requirements as specified in 40 CFR 63.6650.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

Insignificant Activity	*Number of Units*	*Insignificant Activity Category*
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	13	35 IAC 201.210(a)(4)
1.8 million Btu/hr natural gas fired boiler used to provide process heat and comfort heat	1	35 IAC 201.210(a)(4)
Storage tanks of gasoline, including gasoline/ethanol blend fuels, with a capacity of less than 2000 gallons;	1	35 IAC 201.210(a)(10)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.	2	35 IAC 201.210(a)(11)
Printing operations with aggregate organic solvent usage < 750 gallons/yr from all printing lines at the source (including organic solvent from inks, dilutents, fountain solutions, and cleaning materials.	1	35 IAC 201.210(a)(14)
Any size storage tanks containing exclusively soaps, detergents, surfactants, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions where an organic solvent has not been mixed.	1	35 IAC 201.210(a)(17)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b) and 35 IAC 212.124.

b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.

d. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304.

e. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 218.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

f. The 1.8 million Btu/hr natural gas fired boiler used to provide process heat and comfort heat shall comply with the applicable requirements in Section 5.2 for future requirements for natural gas-fired process heaters.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

A. A description of the emission unit including the function and expected operating schedule of the unit.

B. A description of any air pollution control equipment or control measures associated with the emission unit.

C. The emissions of regulated air pollutants in lbs/hr and tons/yr.

D. The means by which emissions were determined or estimated.

E. The estimated number of such emission units at the source.

F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.

ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.

iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 – Other Requirements

1. Testing

a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:

i. The name and identification of the emission unit(s) being tested.

ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.

iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.

iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.

v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.

vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.

vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

ix. Sampling of materials, QA/QC procedures, inspections, etc.

b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.5(7)(a) of the Act as follows:

i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.

ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.

c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.5(7)(a) of the Act. The Final Report shall include as a minimum:

i. General information including emission unit(s) tested.

ii. A summary of results.

iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).

iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.

v. Detailed description of test conditions, including:

A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.

B. Control equipment information, i.e., equipment condition and operating parameters during testing.

C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.

vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

vii. An explanation of any discrepancies among individual tests or anomalous data.

viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.

ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.

x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.

d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units – 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]

ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units: [35 IAC 212.321(c)]

P (T/hr)	E (lbs/hr)	P (T/hr)	E (lbs/hr)
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

b. Existing Process Emission Units – 35 IAC 212.322

Existing Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972. [35 IAC 212.322]

i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c)). See Condition 7.2(b)(iii) below. [35 IAC 212.322(a)]

ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation: [35 IAC 212.322(b)]

$$E = C + A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 30 T/hr:

A = 4.10
B = 0.67
C = 0

B. Process weight rates greater than or equal to 30 T/hr:

A = 55.0
B = 0.11
C = -40.0

iii. Limits for Existing Process Emission Units: [35 IAC 212.322(c)]

P (T/hr)	E (lbs/hr)	P (T/hr)	E (lbs/hr)
0.05	0.55	25.00	35.40
0.10	0.87	30.00	40.00
0.2	1.40	35.00	41.30
0.30	1.83	40.00	42.50
0.40	2.22	45.00	43.60
0.50	2.58	50.00	44.60
0.75	3.38	100.00	51.20
1.00	4.10	150.00	55.40
2.00	6.52	200.00	58.60
3.00	8.56	250.00	61.00
4.00	10.40	300.00	63.10
5.00	12.00	350.00	64.90
10.00	19.20	400.00	66.20
15.00	25.20	450.00	67.70
20.00	30.50	500.00	69.00

3. Emissions Reduction Market System (ERMS) Requirements

a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.

b. Obligation to Hold Allotment Trading Units (ATUs)

i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 – September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation", as described in Condition 7.3(d):

A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.

B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.

C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).

D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.

E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).

ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 4 of this permit.

c. Market Transactions

i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.

ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.

iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.

iv. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.

d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the Owner or Operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions:

No exceptions

ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.

B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:

A. Actual seasonal emissions of VOM from the source.

B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.

C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.

E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).

F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

ii. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

i. A. The allotment of ATUs to this source is 658 ATUs per seasonal allotment period.

I. 147 ATUs are being assigned based on the Illinois EPA's determination that the source's baseline emissions were 16.6446 tons per season. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.

II. Additional 47 ATUs have been allocated and transferred from the shutdown of the A. J. Gerrard facility (I.D.031027AAB).

III. Finally, 468 ATUs have been allocated and transferred from the shutdown of the ACME Packaging facility (I.D.031063ABU).

B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 16.6446 tons per season.

C. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.3(i) of this permit.

D. ATUs will be issued to the source's Transaction Account by the IEPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

ii. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	*Construction Permit No.*	*Date Issued*
Magnus 4 Strapping Line Contact Pot; Magnus 4 Strapping Line Quench Pot	99030098	7/31/2001
Paint Dip Tank (Magnus 4 Strapping Line); Electric Paint Drying Oven (Magnus 4 Strapping Line); Wax Applicator/Electric Dryer (Magnus 4 Strapping Line)	99030098	7/31/2001
Punch Press Department #2	01020025	4/13/2001

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.

B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.

C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

i. Seasonal component of the Annual Emissions Report.

ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e)(i).

iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:

I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.

II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.

III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.

B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:

Fuel Combustion Emission Units

ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.

B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:

None

4. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and SSSS – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil

Pursuant to 40 CFR 63 Subpart A and SSSS, the Permittee shall comply with the following applicable General Provisions as indicated:

General provisions reference	Applicable to subpart SSSS	Explanation
§63.1(a)(1)-(4)	Yes	
§63.1(a)(5)	No	Reserved.
§63.1(a)(6)-(8)	Yes	
§63.1(a)(9)	No	Reserved.
§63.1(a)(10)-(14)	Yes	
§63.1(b)(1)	No	Subpart SSSS specifies applicability.
§63.1(b)(2)-(3)	Yes	
§63.1(c)(1)	Yes	
§63.1(c)(2)	Yes	
§63.1(c)(3)	No	Reserved.
§63.1(c)(4)	Yes	
§63.1(c)(5)	Yes	
§63.1(d)	No	Reserved.
§63.1(e)	Yes	
§63.2	Yes	Additional definitions in subpart SSSS.
§63.3(a)-(c)	Yes	
§63.4(a)(1)-(3)	Yes	
§63.4(a)(4)	No	Reserved.
§63.4(a)(5)	Yes	
§63.4(b)-(c)	Yes	
§63.5(a)(1)-(2)	Yes	
§63.5(b)(1)	Yes	
§63.5(b)(2)	No	Reserved.
§63.5(b)(3)-(6)	Yes	
§63.5(c)	No	Reserved.
§63.5(d)	Yes	Only total HAP emissions in terms of tons per year are required for §63.5(d)(1)(ii)(H).

General provisions reference	Applicable to subpart SSSS	Explanation
§63.5(e)	Yes	
§63.5(f)	Yes	
§63.6(a)	Yes	
§63.6(b)(1)-(5)	Yes	
§63.6(b)(6)	No	Reserved.
§63.6(b)(7)	Yes	
§63.6(c)(1)-(2)	Yes	
§63.6(c)(3)-(4)	No	Reserved.
§63.6(c)(5)	Yes	
§63.6(d)	No	Reserved.
§63.6(e)	Yes	Provisions in §63.6(e)(3) pertaining to startups, shutdowns, malfunctions, and CEMS only apply if an add-on control system is used.
§63.6(f)	Yes	
§63.6(g)	Yes	
§63.6(h)	No	Subpart SSSS does not require continuous opacity monitoring systems (COMS).
§63.6(i)(1)-(14)	Yes	
§63.6(i)(15)	No	Reserved.
§63.6(i)(16)	Yes	
§63.6(j)	Yes	
§63.7	Yes	With the exception of §63.7(a)(2)(vii) and (viii), which are reserved.
§63.8(a)(1)-(2)	Yes	
§63.8(a)(3)	No	Reserved.
§63.8(a)(4)	Yes	
§63.8(b)	Yes	
§63.8(c)(1)-(3)	Yes	Provisions only apply if an add-on control system is used.
§63.8(c)(4)	No	
§63.8(c)(5)	No	Subpart SSSS does not require COMS.
§63.8(c)(6)	Yes	Provisions only apply if CEMS are used.
§63.8(c)(7)-(8)	Yes	
§63.8(d)-(e)	Yes	Provisions only apply if CEMS are used.
§63.8(f)(1)-(5)	Yes	

General provisions reference	Applicable to subpart SSSS	Explanation
§63.8(f)(6)	No	Section 63.8(f)(6) provisions are not applicable because subpart SSSS does not require CEMS.
§63.8(g)(1)-(4)	Yes	
§63.8(g)(5)	No	
§63.9(a)	Yes	
§63.9(b)(1)	Yes	
§63.9(b)(2)	Yes	With the exception that §63.5180(b)(1) provides 2 years after the proposal date for submittal of the initial notification.
§63.9(b)(3)-(5)	Yes	
§63.9(c)-(e)	Yes	
§63.9(f)	No	Subpart SSSS does not require opacity and visible emissions observations.
§63.9(g)	No	Provisions for COMS are not applicable.
§63.9(h)(1)-(3)	Yes	
§63.9(h)(4)	No	Reserved.
§63.9(h)(5)-(6)	Yes	
§63.9(i)	Yes	
§63.9(j)	Yes	
§63.10(a)	Yes	
§63.10(b)(1)-(3)	Yes	Provisions pertaining to startups, shutdowns, malfunctions, and maintenance of air pollution control equipment and to CEMS do not apply unless an add-on control system is used. Also, paragraphs (b)(2)(vi), (x), (xi), and (xiii) do not apply.
§63.10(c)(1)	No	
§63.10(c)(2)-(4)	No	Reserved.
§63.10(c)(5)-(8)	No	
§63.10(c)(9)	No	Reserved.
§63.10(c)(10)-(15)	No	
§63.10(d)(1)-(2)	Yes	
§63.10(d)(3)	No	Subpart SSSS does not require opacity and visible emissions observations.
§63.10(d)(4)-(5)	Yes	
§63.10(e)	No	
§63.10(f)	Yes	
§63.11	Yes	

General provisions reference	Applicable to subpart SSSS	Explanation
§63.12	Yes	
§63.13	Yes	
§63.14	Yes	Subpart SSSS includes provisions for alternative ASTM and ASME test methods that are incorporated by reference.
§63.15	Yes	

b. 40 CFR 63 Subpart A and ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Pursuant to 40 CFR 63 Subpart A and ZZZZ, the Permittee shall comply with the following applicable General Provisions as indicated:

General provisions reference	Subject of citation	Applicable to subpart ZZZZ	Explanation
§63.1	General applicability of the General Provisions	Yes	
§63.2	Definitions	Yes	Additional terms defined in §63.6675.
§63.3	Units and abbreviations	Yes	
§63.4	Prohibited activities and circumvention	Yes	
§63.5	Construction and reconstruction	Yes	
§63.6(a)	Applicability	Yes	
§63.6(b)(1)-(4)	Compliance dates for new and reconstructed sources	Yes	
§63.6(b)(5)	Notification	Yes	
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes	
§63.6(c)(1)-(2)	Compliance dates for existing sources	Yes	
§63.6(c)(3)-(4)	[Reserved]		
§63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes	
§63.6(d)	[Reserved]		
§63.6(e)	Operation and maintenance	No	
§63.6(f)(1)	Applicability of standards	No	
§63.6(f)(2)	Methods for determining compliance	Yes	
§63.6(f)(3)	Finding of compliance	Yes	
§63.6(g)(1)-(3)	Use of alternate standard	Yes	
§63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§63.6(i)	Compliance extension procedures and criteria	Yes	

General provisions reference	Subject of citation	Applicable to subpart ZZZZ	Explanation
§63.6(j)	Presidential compliance exemption	Yes	
§63.7(a)(1)-(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§63.6610, 63.6611, and 63.6612.
§63.7(a)(3)	CAA section 114 authority	Yes	
§63.7(b)(1)	Notification of performance test	Yes	Except that §63.7(b)(1) only applies as specified in §63.6645.
§63.7(b)(2)	Notification of rescheduling	Yes	Except that §63.7(b)(2) only applies as specified in §63.6645.
§63.7(c)	Quality assurance/test plan	Yes	Except that §63.7(c) only applies as specified in §63.6645.
§63.7(d)	Testing facilities	Yes	
§63.7(e)(1)	Conditions for conducting performance tests	No	Subpart ZZZZ specifies conditions for conducting performance tests at §63.6620.
§63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at §63.6620.
§63.7(e)(3)	Test run duration	Yes	
§63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes	
§63.7(f)	Alternative test method provisions	Yes	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
§63.7(h)	Waiver of tests	Yes	
§63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at §63.6625.
§63.8(a)(2)	Performance specifications	Yes	
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring for control devices	No	
§63.8(b)(1)	Monitoring	Yes	
§63.8(b)(2)-(3)	Multiple effluents and multiple monitoring systems	Yes	
§63.8(c)(1)	Monitoring system operation and maintenance	Yes	
§63.8(c)(1)(i)	Routine and predictable SSM	No	

General provisions reference	Subject of citation	Applicable to subpart ZZZZ	Explanation
§63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes	
§63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No	
§63.8(c)(2)-(3)	Monitoring system installation	Yes	
§63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§63.8(c)(6)-(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§63.8(d)	CMS quality control	Yes	
§63.8(e)	CMS performance evaluation	Yes	Except for §63.8(e)(5)(ii), which applies to COMS.
		Except that §63.8(e) only applies as specified in §63.6645.	
§63.8(f)(1)-(5)	Alternative monitoring method	Yes	Except that §63.8(f)(4) only applies as specified in §63.6645.
§63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that §63.8(f)(6) only applies as specified in §63.6645.
§63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§63.6635 and 63.6640.
§63.9(a)	Applicability and State delegation of notification requirements	Yes	
§63.9(b)(1)-(5)	Initial notifications	Yes	Except that §63.9(b)(3) is reserved.
		Except that §63.9(b) only applies as specified in §63.6645.	
§63.9(c)	Request for compliance extension	Yes	Except that §63.9(c) only applies as specified in §63.6645.
§63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that §63.9(d) only applies as specified in §63.6645.

General provisions reference	Subject of citation	Applicable to subpart ZZZZ	Explanation
§63.9(e)	Notification of performance test	Yes	Except that §63.9(e) only applies as specified in §63.6645.
§63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(1)	Notification of performance evaluation	Yes	Except that §63.9(g) only applies as specified in §63.6645.
§63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.
		Except that §63.9(g) only applies as specified in §63.6645.	
§63.9(h)(1)-(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. §63.9(h)(4) is reserved.
			Except that §63.9(h) only applies as specified in §63.6645.
§63.9(i)	Adjustment of submittal deadlines	Yes	
§63.9(j)	Change in previous information	Yes	
§63.10(a)	Administrative provisions for recordkeeping/reporting	Yes	
§63.10(b)(1)	Record retention	Yes	Except that the most recent 2 years of data do not have to be retained on site.
§63.10(b)(2)(i)-(v)	Records related to SSM	No	
§63.10(b)(2)(vi)-(xi)	Records	Yes	
§63.10(b)(2)(xii)	Record when under waiver	Yes	
§63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§63.10(b)(2)(xiv)	Records of supporting documentation	Yes	
§63.10(b)(3)	Records of applicability determination	Yes	
§63.10(c)	Additional records for sources using CEMS	Yes	Except that §63.10(c)(2)-(4) and (9) are reserved.

General provisions reference	Subject of citation	Applicable to subpart ZZZZ	Explanation
§63.10(d)(1)	General reporting requirements	Yes	
§63.10(d)(2)	Report of performance test results	Yes	
§63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.10(d)(4)	Progress reports	Yes	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No	
§63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes	
§63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§63.10(e)(3)	Excess emission and parameter exceedances reports	Yes	Except that §63.10(e)(3)(i) (C) is reserved.
§63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§63.10(f)	Waiver for recordkeeping/reporting	Yes	
§63.11	Flares	No	
§63.12	State authority and delegations	Yes	
§63.13	Addresses	Yes	
§63.14	Incorporation by reference	Yes	
§63.15	Availability of information	Yes	

c. 40 CFR 63 Subpart A and DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Pursuant to 40 CFR 63 Subpart A and DDDDD, the Permittee shall comply with the following applicable General Provisions as indicated:

General provisions reference	Subject	Applicable to subpart DDDDD
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.7575
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.
§63.5	Preconstruction Review and Notification Requirements	Yes.
§63.6(a), (b)(1)-(b)(5), (b)(7), (c)	Compliance with Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	General duty to minimize emissions	No. See §63.7500(a)(3) for the general duty requirement.
§63.6(e)(1)(ii)	Requirement to correct malfunctions as soon as practicable	No.
§63.6(e)(3)	Startup, shutdown, and malfunction plan requirements	No.
§63.6(f)(1)	Startup, shutdown, and malfunction exemptions for compliance with non-opacity emission standards	No.
§63.6(f)(2) and (3)	Compliance with non-opacity emission standards	Yes.
§63.6(g)	Use of alternative standards	Yes.
§63.6(h)(1)	Startup, shutdown, and malfunction exemptions to opacity standards	No. See §63.7500(a).
§63.6(h)(2) to (h)(9)	Determining compliance with opacity emission standards	Yes.

General provisions reference	Subject	Applicable to subpart DDDDD
§63.6(i)	Extension of compliance	Yes. Note: Facilities may also request extensions of compliance for the installation of combined heat and power, waste heat recovery, or gas pipeline or fuel feeding infrastructure as a means of complying with this subpart.
§63.6(j)	Presidential exemption	Yes.
§63.7(a), (b), (c), and (d)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Conditions for conducting performance tests	No. Subpart DDDDD specifies conditions for conducting performance tests at §63.7520(a) to (c).
§63.7(e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§63.8(a) and (b)	Applicability and Conduct of Monitoring	Yes.
§63.8(c)(1)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No. See §63.7500(a)(3).
§63.8(c)(1)(ii)	Operation and maintenance of CMS	Yes.
§63.8(c)(1)(iii)	Startup, shutdown, and malfunction plans for CMS	No.
§63.8(c)(2) to (c)(9)	Operation and maintenance of CMS	Yes.
§63.8(d)(1) and (2)	Monitoring Requirements, Quality Control Program	Yes.
§63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to a startup, shutdown, and malfunction plan. Startup, shutdown, and malfunction plans are not required.
§63.8(e)	Performance evaluation of a CMS	Yes.
§63.8(f)	Use of an alternative monitoring method.	Yes.
§63.8(g)	Reduction of monitoring data	Yes.
§63.9	Notification Requirements	Yes.

General provisions reference	Subject	Applicable to subpart DDDDD
§63.10(a), (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	Yes.
§63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(b)(2)(iii)	Maintenance records	Yes.
§63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during startup, shutdown, or malfunction	No.
§63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(10) and (11)	Recording nature and cause of malfunctions, and corrective actions	No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.
§63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(15)	Use of startup, shutdown, and malfunction plan	No.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No. See §63.7550(c)(11) for malfunction reporting requirements.
§63.10(e)	Additional reporting requirements for sources with CMS	Yes.

General provisions reference	Subject	Applicable to subpart DDDDD
§63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§63.11	Control Device Requirements	No.
§63.12	State Authority and Delegation	Yes.
§63.13–63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.
§63.1(a)(5),(a)(7)–(a)(9), (b)(2), (c)(3)–(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)–(4), (c)(9).	Reserved	No.

Section 8 – State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

Pollutant		*Tons/Year*
Volatile Organic Material	(VOM)	166.87
Sulfur Dioxide	(SO_2)	0.23
Particulate Matter	(PM)	49.93
Nitrogen Oxides	(NO_x)	39.46
HAP, not included in VOM or PM	(HAP)	–
	Total	256.49

Attachment 1 - List of Emission Units at This Source

Section	*Emission Units*	*Description*
4.1	Cold Rolling Mill	The Cold Rolling Mill is used to reduce the thickness of the steel coils when they arrive at the source. Emissions from the cold rolling operation are collected by four exhaust hoods and ducted to Mist Eliminator #1 and #2.
4.2	Contact & Quench Pots (Magnus Lines)	At all Magnus lines, the slit steel is cleaned and heat treated as it passes through two lead pots in series. The first pot is the Contact Pot and the second pot is the Quench Pot. The pots are heated via natural gas combustion.
4.3	Strapping Coating Lines and Wax Applicators (Subject to 40 CFR 60 Subpart TT)	The strap is painted at the dip tanks (M4 3) and dried at the ovens (M4-4). Finally, wax is applied and dried at M4-5. Wax is also applied and dried at R-1, PRINT-1 and SLIT-2. This operation is considered surface coating of metal coils and is subject to the requirements of NSPS TT and NESHAP SSSS.
4.4	Strapping Coating Lines and Wax Applicators	The strap is painted at the dip tanks (A-2, M2-3, and M3-3) and dried at the ovens (A-3, M2-4, and M3-4). Finally, wax is applied and dried at A-4, M2-5, and M3-5. This operation is considered surface coating of metal coils and is subject to the requirements of NESHAP SSSS.
4.5	Punch Press Department	Emissions of volatile organic material (VOM) result from the vanishing oil used to lubricate the steel during punching. The Permittee operates punch presses to produce steel seals used to clamp the ends of steel strapping together.
4.6	Grit Seal Lines	Grit Seal Lines #1 and #2 are comprised of two presses each controlled by a cyclone. Steel straps of different widths are purchased with an adhesive coating applied to one side. The steel strap is passed through an electric heater to melt the adhesive. After a crimping operation, aluminum oxide grit is applied to the adhesive side of the strap to form the final product.
4.7	Boilers	Two natural gas-fired boilers are used for production of hot water for the source needs.
4.8	Space Heaters	The natural gas-fired space heaters are used to retain a comfortable working temperature in the facility.
4.9	Fugitive PM Emissions	Emissions caused by moving vehicles that creates particulate matter (road dust) emissions on paved and/or unpaved roadways. Particulate Matter also may be emitted from loading/unloading operations at the source.
4.10	Iron Phosphate Cleaning Tank	Cleans metal prior to being processed by the Apex Strapping Line.

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO_2	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H_2S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
kw	Kilowatts
LAER	Lowest Achievable Emission Rate
lbs	Pound

m	Meter
MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mos	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO_2	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 – Contact and Reporting Addresses

IEPA Compliance Section	Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 Phone No.: 217/782-2113
IEPA Stack Test Specialist	Illinois EPA, Bureau of Air Compliance Section Source Monitoring – Third Floor 9511 Harrison Street Des Plaines, Illinois 60016 Phone No.: 847/294-4000
IEPA Air Quality Planning Section	Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 Phone No.: 217/782-2113
IEPA Air Regional Field Operations Regional Office #1	Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016 Phone No.: 847/294-4000
IEPA Permit Section	Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506 Phone No.: 217/785-1705
USEPA Region 5 – Air Branch	USEPA (AR – 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604 Phone No.: 312/353-2000

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H)) AUTHORIZED SIGNATURE: BY: _____ _____ AUTHORIZED SIGNATURE TITLE OF SIGNATORY _____ _____/_____/_____ TYPED OR PRINTED NAME OF SIGNATORY DATE